

EAGLE TELEPHONE SYSTEM, INC.
d/b/a SNAKE RIVER PCS
P.O. Box 178
109 Main Street
Richland, OR 97870

August 1, 2003

Via Electronic Comment Filing System

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attn: John B. Muleta, Chief, Wireless Telecommunications Bureau
David H. Solomon, Chief, Enforcement Bureau

Re: Interim Status Report Regarding E-911 Compliance
Eagle Telephone System, Inc. d/b/a Snake River PCS
CC Docket No. 94-102

Dear Ms. Dortch:

Eagle Telephone System, Inc. ("Eagle"), in accordance with the *Stay Order* in Docket No. 94-102, hereby submits its Interim Status Report regarding implementation of Phase I and Phase II wireless E-911 service.¹

As background, Eagle is a small, rural wireless carrier licensed to operate a commercial wireless network on various disaggregated frequencies in certain portions of Baker County, Oregon, Union County, Oregon and Wallowa County, Oregon pursuant to three broadband Personal Communications Services ("PCS") licenses.² Eagle acquired these licenses on December 13, 2000, June 15, 2001, and May 24, 2002, respectively, and launched commercial service on September 27, 2001. Eagle is part of a consortium of small, rural PCS licensees in Idaho and Oregon conducting business under the "Snake River PCS" brand name. As a member

¹ *In re Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Order to Stay, 17 FCC Rcd 14841, ¶¶ 34-35 (2002)(*Stay Order*); Eagle is listed in Appendix A of the *Non-Nationwide Carrier E-911 Order* as one of the carriers that filed a request for waiver of the Commission's E-911 rules.

² See Call Signs WPQT670, WPQS784 and WPUK735.

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of the consortium, Eagle has agreed to purchase all of its wireless switching services and handsets directly from Farmers Mutual Telephone Company ("Farmers"), another member of the consortium. As such, and as previously reported, Eagle has been subject to and has received the same technology upgrades as Farmers to provide E-911 services.

Accordingly, Eagle hereby associates itself with, and incorporates by reference, Farmers' Interim Status Report for E-911 compliance. In addition, Eagle reports the following in response to the Commission's requirements:

- **The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid);**

Eagle has not received any requests for Phase I or Phase II service.

- **Specific technology choice and status of implementation**

Eagle, like Farmers, has elected a handset-based solution for its CDMA 1900 PCS network due to the rural nature of the area it serves. As towers are sparsely located in Eagle's network, a network-based solution is not a feasible option.

Eagle has not received any PSAP requests at this time. Accordingly, implementation has not begun.

- **Status on ordering and/or installing necessary network equipment:**

Farmers' Nortel DMS100 MTX10 switch and software load are Phase I and Phase II compliant. Vendor presentations for associated database services are currently being reviewed.

- **ALI-capable handsets**

Eagle, via Farmers, currently offers for sale the following ALI-capable handsets: Kyocera models 2325 and 7135 and Motorola models T720, 120e and V.60i. Eagle has not encountered any issues with obtaining these handset models. As such, Eagle has already met the first handset activation benchmark set forth in the *Stay Order*. Testing of the handsets has not occurred given that: (1) Eagle has not received any PSAP requests, (2) Farmers' PSAPs do not have equipment in place to test the handsets, and (3) a database provider has not yet been selected.

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- **Estimated date of Phase II implementation**

Farmers estimates that Phase II service will be available to it, and by extension to Eagle, by the 2nd quarter of 2004 for any PSAPs validly requesting service. Eagle anticipates that it will be able to meet the 6 month implementation deadline should it receive a valid PSAP request prior to that time.

- **Schedule to meet the ultimate implementation date of December 31, 2005**

At this time, Farmers and Eagle do not anticipate any difficulty meeting this deadline.

Respectfully submitted,

Eagle Telephone System, Inc.
d/b/a Snake River PCS



Patrick A. Lattin,
General Manager

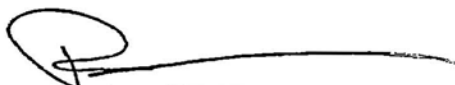
cc: via e-mail to E911compliancereports@fcc.gov

AFFIDAVIT OF PATRICK A. LATTIN

I. Patrick A. Lattin, do hereby declare under penalty of perjury that:

1. I am General Manager of Eagle Telephone System, Inc. d/b/a Snake River PCS ("Eagle"). In this capacity, I am familiar with Eagle's E-911 deployment efforts.
2. I have read the foregoing E-911 Interim Report for Eagle and that it is true, accurate and complete to the best of my knowledge, information or belief.

Dated this 1st day of August, 2003

A handwritten signature in black ink, consisting of a large, stylized capital 'P' followed by a horizontal line extending to the right.

Patrick A. Lattin, General Manager
Eagle Telephone System, Inc.
d/b/a Snake River PCS